

EXHIBIT B

Eric Stubenvoll

From: Eric Stubenvoll
Sent: Wednesday, July 09, 2008 8:16 AM
To: amonaco@smbtrials.com; (kschicht@smbtrials.com)
Subject: Cahill v. Smith & Nephew

I write with respect to Smith & Nephew's discovery responses in this matter, in the hope that we can resolve certain issues. First, with respect to Smith & Nephew's document production, I note that no emails or other electronic data were produced. Please advise as to whether a search was made for such information.

Second, in Interrogatory 15 and Request for Production 9, we asked for information regarding claims of defects in not only the model hip at issue, but similar models. You identified one claim with respect to the Model 7130413 hip. I would like to receive further information regarding those claims, including all documents, which were not included. I would also ask that you identify claims of defect relating to similar model hips, including prior and subsequent versions of the Echelon.

Next, I see no documents relating to Smith & Nephew's internal analysis of the hip at issue in this litigation. I obviously am not seeking privileged information, but if internal documents exist, I believe they should be produced. This would include any photographs or SEM images.

As we discussed yesterday, I will be issuing a few deposition notices today. I will choose a date, but we can schedule them at a time and location that is hopefully convenient to all. I will get back to you with a proposed discovery schedule later today as well.

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